

1 reference.

2 MR. GAFFNEY: Thank you, Your Honor.

3 JUDGE STEINBERG: And the same ruling will obtain.

4 Let's take a break I want to fill up and get  
5 some more water.

6 Do you need a substantial period of time to  
7 prepare? Okay, so let's just take about five or 10 minutes.

8 (Whereupon, a recess was taken.)

9 JUDGE STEINBERG: Back on the record.

10 Before you start cross-examination, let me --  
11 there is just one follow-up question I have to ask. And  
12 that's Chris Kellogg, when was the last time you saw him?

13 THE WITNESS: He came to the station after Bianchi  
14 was terminated. When exactly. I am not sure. This would  
15 have been like some time late November, early December. But  
16 I know Mike brought him to make sure everything was  
17 straightened out. And then brought in another -- a guy to  
18 be the program director, and I -- for the life of me, I  
19 can't recall his name. But he was an employee of the  
20 Columbia station, and had worked with Kellogg over there.

21 JUDGE STEINBERG: Have you --

22 THE WITNESS: And they brought him in there as the  
23 PD.

24 JUDGE STEINBERG: Have you seen Mr. Kellogg or  
25 spoken to him let's say in the last six months to a year?

1 THE WITNESS: No, sir

2 JUDGE STEINBERG: Okay.

3 THE WITNESS: No, sir

4 REBUTTAL CROSS-EXAMINATION

5 BY MR. GAFFNEY:

6 Q Mr. Rhea.

7 A Yes, sir.

8 Q My name is Michael Gaffney and am counsel for the  
9 Licensees in this case.

10 We have spoken on the phone before; is that right?

11 A Yes, sir.

12 Q Now, you testified, sir, that you had a great deal  
13 of experience with different broadcast companies and  
14 different owners?

15 A Yes.

16 Q You have had the occasion to observe style of  
17 different owners and the level of their participation in  
18 their stations?

19 A I have, sir.

20 Q And Mr. Rice was, I believe you said that Mr. Rice  
21 was described to you as an absentee owner?

22 A That's right.

23 Q Do you still agree with that description?

24 A You mean is he now an absentee owner or what?

25 (Laughter.)

1           Q     The period of time in which you were employed at  
2     the stations, did he remain an absentee owner?

3           A     In my mind, yes.

4           Q     And you also mentioned that there was a project  
5     going on in Terre Haute about change of the frequency of the  
6     station?

7           A     Yes, sir.

8           Q     And Mr. Rice was there to -- on many occasions to  
9     facilitate that?

10          A     He was, yes.

11          Q     That was the installation of equipment?

12          A     Right.

13          Q     Correct?

14          A     Um-hmm.

15          Q     And in the technical aspects of --

16          A     Right.

17          Q     -- the signals, right?

18          A     I think, put up a new tower and brought in a new  
19     transmitter, and it was quite a bit of technical going on.

20          Q     And he wasn't there to tell you how to manage your  
21     station, was he, when he was there working on the AM  
22     station, or to tell you how to -- the management policy in  
23     your station, right?

24          A     Well, that's not exactly true. I mean, he -- we  
25     just went through a case of where, you know, we discussed

1 programming. We discussed personnel and so forth.

2 Q Let me state it this way.

3 Mr. Rice --

4 A But he would do that on these trips with regard to  
5 the transmitter.

6 Q When he was working on the transmitter?

7 A Um-hmm He took that opportunity to meet with me  
8 and what have you.

9 As I told you before. I saw no problem with that  
10 whatsoever.

11 Q And there were many times that he came and worked  
12 on the transmitter where he didn't have these conversations  
13 with you, right?

14 A That's right.

15 Q And the same with his activities as landlord, he  
16 owned some leased space there too, right?

17 A Exactly.

18 Q And he many times would come there in connection  
19 with that business and not the broadcasting business?

20 A That's right.

21 Q Now, you discussed an initial lunch where you were  
22 talking about a program director oat WBOW.

23 A Um-hmm.

24 Q And you said that Mr. Rice expressed an opinion as  
25 to an individual

1           He didn't tell you to go out and hire him, did he?

2           A     I beg your pardon?

3           Q     He didn't tell you to go out and hire this guy,  
4     did he, Mr. Rice?

5           A     Which guy are we talking about?

6           Q     A program director

7                     Why don't you remind me what your testimony was  
8     concerning a lunch that Mike Rice had with you about hiring  
9     a program director?

10          A     I had a couple of lunches with Mike in the  
11     beginning. We had lunch, as I said, the first lunch was  
12     basically talking about his career and my career with regard  
13     to where we had been and so forth. And then the  
14     conversation alluded to the formatics of WBOW.

15                     And in the subsequent luncheon, which was a month  
16     or so later, we discussed those formatics again, and --

17          Q     And the name Mike Steel came up?

18          A     No. The name of Chip Ramsey came up.

19          Q     Chip Ramsey came up.

20          A     Chip Ramsey was aboard when I came to the station,  
21     as the program director of WBOW.

22          Q     I am talking about the conversation you had where  
23     you first heard about Mike Steel.

24                     Is that a conversation you had with Michael Rice?

25          A     He was there -- we were sort of without a program

1 director at that time because Todd Hohlman had left. He  
2 took a job in Florida, as best as I can recollect, somewhere  
3 else. And the station was kind of without. And Mike, in  
4 one of our luncheons, says, "Yeah, I know of a guy in St.  
5 Louis that I think I might be able to get."

6 Q And you got a call from Janet Cox, didn't you?

7 A Um-hmm.

8 Q Then he was hired.

9 JUDGE STEINBERG: Please try to answer yes.

10 THE WITNESS: Yes.

11 BY MR. GAFFNEY:

12 Q And Janet Cox never said to you, "I hired this guy  
13 because Mike Rice told me to," did she?

14 A Well, in previous conversations with --

15 Q No, that conversation when she said to hire --  
16 when she said he was hired, excuse me.

17 A No.

18 Q Now, you said that Mr. Rice wasn't fond of Chip  
19 Ramsey, but Mr. Ramsey was working there during the period  
20 of time that Mr. Rice said he wasn't fond of him, correct?

21 A That's right. He had worked for him before.

22 Q And he had worked for him before.

23 And it was Janet Cox who fired Mr. Ramsey  
24 eventually, correct?

25 A Wrong. I did.

1 Q You did.

2 A That's right.

3 Q And it was Janet Cox who told you to.

4 A That's right.

5 Q Now, eventually Mr. Steel was also terminated,  
6 correct?

7 A That's right.

8 Q And you fired him at Janet's instructions, right?

9 A Janet and Mike's, because I talked to Mike in that  
10 particular instance.

11 Q Okay.

12 A And he was -- as I said, he was really upset over  
13 what he had done.

14 Q Right. And so was Janet, correct?

15 A That's right.

16 Q And your experience in this field, if someone had  
17 done what Mr. Steel had done, changed the way that the  
18 station was being reported, its format, it's a serious  
19 problem, isn't it?

20 A It can be.

21 Q And quite independent of whether Mr. Rice was  
22 livid, as you say, about this, isn't it also the case that  
23 so was Janet Cox?

24 A Oh, I think so.

25 Q And this activity, quite aside from Mr. Rice's

1 input, as far as you know could well have led to Janet Cox's  
2 decision to fire Mr. Steel; isn't that right?

3 A Not necessarily.

4 Q Did Janet Cox not have the authority to fire Mr.  
5 Steel?

6 A She did. She had firing authority.

7 Q Was she not upset about the reporting change that  
8 he made?

9 A Yes.

10 Q Was it not her who called you up and told you to  
11 fire him?

12 A Um-hmm.

13 JUDGE STEINBERG: Okay, that's a yes?

14 THE WITNESS: Yes.

15 BY MR. GAFFNEY:

16 Q We also talked a little bit about Steve Holler,  
17 who is the son of the office manager, Margaret Holler,  
18 correct?

19 A That's right.

20 Q Now, thinking back, isn't it true that you were  
21 reluctant to hire him in the first place because of that  
22 association with his mother being the office manager?

23 A No. You mean -- no, no, not at all.

24 Q No?

25 A Not at all.



1           Q     So you had no qualms about that? That didn't  
2     affect your hiring decision. You didn't consider that at  
3     all?

4           A     No.

5           Q     All right. Now, again, it was Janet who called  
6     you and told you to fire young Mr. Holler, right?

7           A     Yeah, but I had also called her initially.

8                 I'm sorry. Yes.

9           Q     It was her. Thank you, sir.

10          A     I'm sorry.

11          Q     And that's the same with Mr. Bianchi or Mr.  
12     Savage, right, that Janet had told you and accompanied you  
13     to that firing, and it was you and she that fired Mr.  
14     Savage?

15          A     That's correct, sir.

16          Q     Now, Mike Rice, you testified, was there and  
17     possibly Chris Kellogg?

18          A     Possibly.

19          Q     Possibly.

20                 If Chris Kellogg had said that actually Janet went  
21     and fired Mr. Savage herself, and that you stayed in another  
22     room and engaged in conversation with Mr. Rice and with  
23     Chris Kellogg, he wouldn't be telling the truth, would he?

24          A     He would not.

25                 JUDGE STEINBERG: Or he could be remembering it

1       incorrectly?

2                   THE WITNESS:   That's right.

3                   BY MR. GAFFNEY.

4           Q       And you also mentioned that there was a conflict  
5       between Chris Kellogg and Savage, right?  You get that  
6       sense?

7           A       Yes.

8           Q       Do you think that had an impact on Mr. Savage's  
9       termination?

10          A       Yes.

11          Q       And do you think that Mr. Kellogg had it in his  
12       mind that he would be better off if Mr. Savage had complied?

13          A       Well, Mr. Kellogg never said that.

14          Q       Okay.  Where did you -- how did you sense this  
15       conflict between Mr. Kellogg and Mr. Savage?  Where did you  
16       get that?

17          A       Well, as I said, it came through Janet and Mike,  
18       because I didn't have that much day-to-day contact with  
19       Kellogg.

20          Q       Okay.

21          A       He was at another city altogether.

22          Q       Now, with respect to your own termination, sir,  
23       when Ms. Cox and Mr Rice came in your office and said that,  
24       what did you say, there was a change of direction was the  
25       only reason they gave you for your termination?

1           A     The only reason Mike gave me.

2           Q     Now, are you aware of any other instances in the  
3     course of your employment that might have given rise to your  
4     termination?

5           A     No.

6           Q     Any personnel complaints that came up while you  
7     were employed there?

8           A     Personnel complaints?

9           Q     Personnel complaints.

10          A     Complaints --

11          Q     Complaints against you by the personnel and by the  
12     staff?

13          A     Not really.

14          Q     You're not aware of any of that?

15                 That isn't true that you were accused of some  
16     unauthorized contact with some of the female employees?

17          A     I was. I was.

18          Q     And --

19                 MR. ZAUNER: Excuse me. Could I have a  
20     clarification of that question? Was that employees or  
21     employee?

22                 MR. GAFFNEY: Employees.

23                 MR. ZAUNER: Plural?

24                 MR. GAFFNEY: That was the question, yes.

25                 MR. ZAUNER: And did the witness understand that

1 when he answered the question?

2 THE WITNESS: Beg your pardon. Yeah.

3 BY MR. GAFFNEY:

4 Q Now, you didn't disagree -- you didn't agree with  
5 those accusations, did you?

6 A Absolutely not, nor did Janet.

7 Q And Janet -- to the extent Janet were to agree  
8 with any of those accusations, you disagreed with her,  
9 right?

10 A Absolutely.

11 Q And I imagine that you felt wrongfully accused?

12 A I did.

13 MR. ZAUNER: I am going to object to this line of  
14 questioning on the grounds of relevancy, Your Honor. It  
15 doesn't seem to go bias. It doesn't seem to go to -- it  
16 certainly isn't related to the testimony that I elicited.

17 MR. GAFFNEY: I would strongly object, Your Honor.  
18 It --

19 JUDGE STEINBERG: No, he objected. You respond.

20 MR. GAFFNEY: I mean, I oppose the objection, Your  
21 Honor. This has everything to do with the bias of a  
22 witness, whether they feel they were unfairly accused by the  
23 company whose licenses are now at stake in this hearing in  
24 which he is giving testimony.

25 JUDGE STEINBERG: Okay. So if you can tie the

1       accusations in with the company rather than particular  
2       individuals. You are just saying certain individuals --

3               MR. GAFFNEY: It was conducted by Janet Cox.

4               JUDGE STEINBERG: Okay, we don't have there here  
5       in the record.

6               MR. GAFFNEY: Well, I thought we did.

7               BY MR. GAFFNEY:

8               Q       And Janet Cox, didn't you just testify, sir, that  
9       it was Janet Cox who confronted you with those accusations?

10              A       It was.

11              JUDGE STEINBERG: Wait. Let's -- I can understand  
12       where you are going and I want to let you continue, but Mr.  
13       Zauner has a point, and I think you are going to have to --

14              MR. GAFFNEY: Your Honor, I think you have  
15       already --

16              JUDGE STEINBERG: And what happened between -- at  
17       this confrontation between Cox, Janet Cox and Mr. Rhea.

18              MR. ZAUNER: Your Honor, if I may be heard. I am  
19       not sure that there has been any --

20              MR. GAFFNEY: I can --

21              MR. ZAUNER: -- testimony -- please let me -- that  
22       there was a confrontation. The only testimony to that came  
23       from counsel who embedded that in the question. We should  
24       find out what happened and whether there was a  
25       confrontation.

1 JUDGE STEINBERG: Well, are you leaving this area  
2 to move someplace else?

3 MR. GAFFNEY: I am, sir. All I wanted to know --

4 JUDGE STEINBERG: Okay, then you can bring that up  
5 on redirect of what the heck went on.

6 Why don't you just leave the room and go out in  
7 the hall for a minute, and close the door because we need to  
8 say something that you --

9 THE WITNESS: Go right ahead, sir.

10 JUDGE STEINBERG: Yes, and you can hum a song to  
11 yourself so you can't hear me.

12 (Witness exits the courtroom.)

13 JUDGE STEINBERG: Okay, the witness left the room  
14 and is presumably in the hall humming.

15 MR. GAFFNEY: I think I have established what I  
16 wanted to with this witness, Your Honor.

17 JUDGE STEINBERG: Yes, but if -- here is my  
18 problem. You know, you are establishing that he's got an  
19 axe to grind against the station, and that's why -- this is  
20 going to appear later, right.

21 MR. GAFFNEY: Correct.

22 JUDGE STEINBERG: He's got an axe to grind, and  
23 therefore he has got a motive for testifying the way he is  
24 testifying.

25 Janet Cox could have come to him and said, "Look,

1     these employees," plural, "have accused you of this. I  
2     don't believe a word of it. You know, what do we do about  
3     it?" You know, that's one way of him being informed by Cox.

4             Another way could be, "These employees told me you  
5     did this. Now, you're going to stop it right away or you  
6     are in trouble. You are going to get fired." And that's a  
7     different way of confronting things.

8             And I think it's important for the record and it's  
9     fair to him to get that clarified, and I will let Mr. Zauner  
10    do it if you want to.

11            MR. ZAUNER: Your Honor, the problem I have with t  
12    his whole line is it seems to me that it's irrelevant.

13            JUDGE STEINBERG: No, it shows bias.

14            MR. ZAUNER: Bias against the stations? He wasn't  
15    fired for this reason.

16            JUDGE STEINBERG: He wasn't told he was fired for  
17    those reasons, but he might have been fired for those  
18    reasons, and he might think he was fired for those reasons.

19            MR. ZAUNER: But the record doesn't indicate any  
20    of that.

21            JUDGE STEINBERG: Okay. Well, I just want to tell  
22    you what my concerns are. If you want to straighten it out,  
23    fine. If you want to straighten it out, fine. If you want  
24    to leave it the way it is --

25            MR. GAFFNEY: Once he said he was unfairly

1 accused, Your Honor, I think I got my answer.

2 JUDGE STEINBERG: Well, but was he unfairly  
3 accused -- I don't remember -- was he unfairly accused by  
4 the employees or by Ms. Cox?

5 MR. ZAUNER: The other things is we're going to a  
6 collateral matter here that we can end up --

7 JUDGE STEINBERG: I mean, there is a distinction.

8 MR. ZAUNER: -- trying the case concerning whether  
9 or not he had an unconsented to touching of another employee  
10 at the station.

11 JUDGE STEINBERG: Is that what this is?

12 MR. GAFFNEY: Well, first of all, Your Honor, it's  
13 a credibility question. I asked him if there is any other  
14 reason and he said no. And then I brought it in on the  
15 credibility of that. There was another reason. And then he  
16 remembered it. So there is both credibility and bias at  
17 stake here.

18 You remember the response to the first question  
19 that there was no personnel problems ever. That wasn't  
20 truthful, or at least he didn't remember it. I have the  
21 ability to test his credibility by asking --

22 JUDGE STEINBERG: No, I don't doubt that for a  
23 minute, but I think what's in the record --

24 MR. GAFFNEY: That's as far as I have to go.

25 JUDGE STEINBERG: Well, I think what's in the



1 record should be as accurate and full and complete as  
2 possible. And I mean, it's open to several interpretations.

3 I mean, is that what we are talking about?

4 MR. GAFFNEY: If the Bureau wants to reopen this  
5 on their redirect, they can do so.

6 JUDGE STEINBERG: Okay.

7 MR. GAFFNEY: I have made my point.

8 JUDGE STEINBERG: Can we bring in the witness?

9 MR. ZAUNER: I'll get him.

10 JUDGE STEINBERG: You can resume the hot seat.

11 THE WITNESS: Thank you, sir.

12 (Witness resumes witness stand.)

13 JUDGE STEINBERG: And let the record reflect that  
14 Mr. Rhea is back.

15 BY MR. GAFFNEY:

16 Q Mr. Rhea, you were informed at one point that the  
17 numbers of BOW were not what they should be?

18 A Yes.

19 Q As a reason for your termination?

20 A That's right.

21 Q And you stated too that you felt that the negative  
22 publicity concerning Mr. Rice's situation contributed to the  
23 numbers going down; is that fair to say?

24 A That's right.

25 Q So to a certain extent if your termination was

1     because the numbers were going down, then you would think  
2     that it was caused by the publicity that Mr. Rice generated  
3     because of his activities, would you not?

4             Would you agree with that?

5             A     To a certain degree, yes, sir.

6             Q     And so to a certain degree, the fact that you were  
7     terminated, if you want to blame someone, wouldn't you blame  
8     Mike Rice?

9             MR. ZAUNER:  Objection.  Is that a question?

10            MR. GAFFNEY:  It is

11            JUDGE STEINBERG:  Yes

12            THE WITNESS:  Would I blame Mike Rice?

13            Not totally.

14            BY MR. GAFFNEY:

15            Q     Not totally?

16            A     No.

17            Q     A little bit?

18            A     Well, may I speak?

19            Q     Well, would you blame him a little bit?

20            A     Yes.

21            Q     Now, sir, you testified early on that you are in a  
22     position now of senior sales representative in Memphis,  
23     right?

24            A     Right.

25            Q     And you began your career as a GM in the broadcast

1 arena some time before 1977, right?

2 Well, let me ask you this question. I don't know  
3 that it did come up.

4 When were you first made a general manager at a  
5 station?

6 A 1972, I think.

7 Q And did you remain in a managerial position right  
8 up until your most recent position?

9 A With the exception of a time that I was with  
10 William B. Tanner & Company, yes.

11 Q So in a period of years, how many of the years  
12 between the early seventies and now did you spend as a GM?

13 A Between --

14 Q About 20 years of that time, right?

15 A That's right.

16 Q And now in this stage of your career you are in a  
17 senior sales representative position, which --

18 A By choice.

19 Q By choice. But it is a position, at least in the  
20 hierarchy of broadcasting, that is not as high as a general  
21 manager position?

22 A That's right.

23 Q Do you think that the termination from  
24 Contemporary was a setback in your career, sir?

25 A Yes. Yeah.

1           Q     And do you feel any animosity toward Janet Rice  
2     for that?

3           MR. ZAUNER:  Objection.

4           MR. GAFFNEY:  Janet Cox for that.  Excuse me, sir.

5           THE WITNESS:  At the time, yes, I did.

6           BY MR. GAFFNEY:

7           Q     And what about with Mr. Rice?

8           A     Well.

9           MR. GAFFNEY:  I have no further questions.

10          MR. ZAUNER:  May I have five minutes to confer  
11     with my counsel?

12          JUDGE STEINBERG:  Sure.  Just go off the record.

13          (Discussion off the record.)

14          MR. GAFFNEY:  I spoke too quickly when I said I  
15     was done.

16          MR. ZAUNER:  No objection.

17          MR. GAFFNEY:  Thank you.

18          BY MR. GAFFNEY:

19          Q     You said that it was Janet and Michael that were  
20     in your office during your termination; is that correct?

21          A     That's right.

22          Q     Is it a better policy when -- in your experience,  
23     when a termination occurs to have a third party in the room,  
24     to have a person firing the person, to have a third party in  
25     there in case there is a need for a witness?

1           A     That's probably true, yes.

2           Q     Okay. Now, you also spoke briefly about the fact  
3     that you went out and shopped for some programming at  
4     Satellite Music Network, is that the right phrase?

5           A     Yes.

6           Q     And you were told that it was too costly?

7           A     Um-hmm.

8           Q     Now, I was a little unclear as to your answer.  
9     Was it, first of all, Janet Cox -- it was Janet Cox who  
10    called you and said that it would be too costly, correct?

11          A     Right.

12          Q     Okay. Now, you don't know whether it was her  
13    independent decision, an accounting decision from her that  
14    it was too costly or not, quite independent of anything from  
15    Mr. Rice, do you?

16          A     No.

17          Q     So that could have been Janet's decision entirely  
18    and exclusively?

19          A     It could have been.

20          Q     You don't have any reason to believe otherwise, do  
21    you?

22          A     Yes.

23          Q     Okay.

24                 JUDGE STEINBERG: Okay, yes?

25                 THE WITNESS: Yes.

1 JUDGE STEINBERG: Yes, you do have reason to  
2 believe otherwise or you don't have reason to believe?

3 THE WITNESS: Because I talked to Mike about this,  
4 and Mike was in -- you have got to remember at this point in  
5 time they were in the throes of making the transition from  
6 one frequency to another frequency on the radio station.  
7 And he was in town most of this time.

8 MR. GAFFNEY: Let me rephrase my question a little  
9 bit then because I don't think I made myself clear.

10 BY MR. GAFFNEY:

11 Q Notwithstanding what Mr. Rice thought about the  
12 cost of it.

13 A I understand.

14 Q You have no reason to believe that Janet Cox  
15 didn't make her own accounting assessment as to the fact  
16 that it was too costly and communicated that to you,  
17 correct?

18 A That's right.

19 MR. GAFFNEY: Thank you, sir. No further  
20 questions.

21 JUDGE STEINBERG: Do you need more huddle time?

22 MR. ZAUNER: No, Your Honor.

23 REBUTTAL REDIRECT EXAMINATION

24 BY MR. ZAUNER:

25 Q You were asked during the cross-examination

1     whether there were any personnel problems at the station  
2     while you were there. And you answered no.

3             And then you were asked some questions concerning  
4     possible allegations against yourself.

5             Why did you answer that there were no personnel  
6     problems given the fact that these other accusations had  
7     been made?

8             A     Well, they had been made. I apologize. They had  
9     been made. The allegations had been made, but there was no  
10    basis in fact for it at all with one or many employees.

11            Q     Were these allegations formally submitted to the  
12    station in writing?

13            A     No.

14            Q     Was there a legal suit ever filed with regard to  
15    these allegations?

16            A     No.

17            Q     Were you ever criminally charged in connection  
18    with any of these allegations?

19            A     Absolutely not.

20            Q     Any assault charges ever pressed against you?

21            A     No.

22            Q     Did Janet Cox come to the station to talk to you  
23    about this?

24            A     She did.

25            Q     And what was her reaction to these charges?

1           A       She -- Janet and I had a fairly good relationship  
2       all the way through, through this tenure of employment. And  
3       she did not -- you know, she thought these were ridiculous  
4       things that were brought up.

5                   Janet knew me as for what I am. And as I said, I  
6       was born and raised perhaps in another era where you could  
7       pat somebody on the back and say "A job well done," and not  
8       be accused of fondling a woman or what have you, and that's  
9       all it was. That's all it was.

10                  She came early in the morning and she was  
11       seemingly in distress that all of this had flared up. And  
12       she calls me in this office, and she brings an attorney, a  
13       local Terre Haute attorney. I don't know how the hell he  
14       was. And they presented this to me. And I couldn't believe  
15       it, but they did.

16                  JUDGE STEINBERG: When you say "she," you mean the  
17       employee or Janet Cox?

18                  THE WITNESS: Janet Cox.

19                  JUDGE STEINBERG: Came with a local Terre Haute  
20       attorney?

21                  THE WITNESS: That's right.

22                  JUDGE STEINBERG: Okay.

23                  THE WITNESS: And they wanted to, I think, more  
24       than anything is just kind of put it to rest throughout the  
25       staff.



1           Now, she comes in and tells me that all these  
2 women at the station said the same thing. I don't know how  
3 the hell she could have found that out when she came in at  
4 9:00 in the morning and, boom she is telling me this,  
5 unless she interviewed them all over the phone. I have no  
6 idea.

7           But anyway this situation arose, and Janet and I  
8 talked about it, and she said, you know, she said, "I just,"  
9 she said, "I know this is not you period. But," she said,  
10 "I have got to put it to rest." So she called a staff  
11 meeting. Didn't point any fingers to me or anybody else.  
12 She just said, "For God sakes, if anybody can't stand to be  
13 touched, at least tell the person that's touching you, 'I  
14 don't want to be touched.' It's as simple as that."

15           And she said, "As far as I am concerned, it's over  
16 and done with."

17           BY MR. ZAUNER:

18           Q     When was this meeting held?

19           A     The latter part of April.

20           Q     And you continued in your employment at the  
21 station until the --

22           A     Yeah, sure.

23           Q     -- middle of December?

24           A     The strange part about it is over the period of  
25 the next few months I had an occasion to talk to all the